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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JENI RIEGER, ALOHA DAVIS, JODIE CHAPMAN,
CARRIE VASSEL, KAREN BURNAUGH, TOM
GARDEN, ADA AND ANGELI GOZON, HERNAN A.
GONZALEZ, PATRICIA A. HENSLEY, CLYDIENE
FRANCIS, PETER and GUNNEL LOWEGARD, and
GRANT BRADLEY, individually and on behalf of a class
of similarly situated individuals,

Plaintiffs,

vs.

VOLKSWAGEN GROUP OF AMERICA, INC., a New
Jersey corporation, d/b/a AUDI OF AMERICA, INC.,
AUDI AG, a German corporation, and VOLKSWAGEN
AG, a German corporation,

Defendants.

Case No. 1:21-cv-10546 (NLH)(MJS)

**[PROPOSED] ORDER GRANTING DEFENDANT
VOLKSWAGEN GROUP OF AMERICA, INC.'S MOTION TO
DISMISS THE CONSOLIDATED CLASS ACTION COMPLAINT**

THIS MATTER comes before the Court upon the motion of Defendant Volkswagen Group of America, Inc. ("VWGoA") for the entry of an Order dismissing all claims in Plaintiffs' Consolidated Class Action Complaint pursuant to Fed. R. Civ. P. 12 (b)(1), 12(b)(6) and 9(b).

The Court having considered the submissions of the parties and oral argument, if any, and for good cause shown,

IT IS on this _____ day of _____, 2022

ORDERED that Defendant VWGoA's Motion to Dismiss is **GRANTED** in its entirety,
and Plaintiffs' Consolidated Class Action Complaint is hereby dismissed with prejudice.

Hon. Noel L. Hillman, U.S.D.J.